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AND AFFILIATED PARTNERSHIPS

MEMO ENDORSED

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August 4, 2020

VIA ECF

Honorable Denise L. Cote United States District Court Southern District of New York 500 Pearl Street, Room 1910 New York, New York 10007 USDC SDNY
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Re:

TransPerfect Global, Inc. v. Lionbridge Technologies, Inc., et al.,

Case No. 1:19-cv-3283-DLC

Dear Judge Cote:

Defendants respectfully request authorization to file under seal Exhibits 1-8 attached to Tana Ryan's Declaration in Support of Defendants' August 4, 2020 Letter re Defendants' Invocation of the Attorney-Client Privilege. The claims upon which this action is based involve agreements that contain confidentiality provisions that require certain information to be kept confidential and not disclosed to outside parties.

In order to address Defendants' invocation of the attorney-client privilege, we must reference the confidentiality agreements, communications discussing those agreements and information shared pursuant to those agreements, and Defendants' confidential communications with advisors and Auction counterparties. Pursuant to Your Honor's Individual Practices, we have enclosed full, unredacted versions of the Exhibits. We have also provided Plaintiff with the unredacted materials.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Aaron Marks

Aaron Marks, P.C.

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cc: All Counsel of Record (via ECF)